

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

MICHAEL DONALDSON,

Plaintiff,

V.

TRAE FUELS, LLC., et al.

Defendants.

Case No.: 3:18CV00097

DEFENDANTS' RULE 26(a)(3) PRE-TRIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(3), Defendants Trae Fuels, LLC and EnviroTech Services, Inc. hereby submit their witness and exhibit list.

I. Witness List

Defendants expect to call the following witnesses at trial:

1. Kevin Whyrick.
2. Beth Aleman.
3. Chris LaRocco.
4. Michelle Mills.
5. John Frink.
6. Michael Donaldson.

Defendants may call the following witnesses if the need arises:

- ## 7. Roger Knoph

8. Gohar Wise
9. Clayton Walker
10. Frances Holiday Olbert
11. Any witness identified on Plaintiff's witness list.
12. Any witness necessary for impeachment or rebuttal.

II. Exhibit List

Defendants Trae Fuels and EnviroTech Services expect to introduce the following exhibits at trial:

Exhibit No.	Description	Bates No.
1	Email Exchanges 1/31/14	Trae 3592, 3612-13, 3639-40, 3650-52
2	Email Exchanges 1/3/14	Trae 2472-73
3	Email Exchanges 2/24/14	Trae 5031-33
4	Mills / Donaldson Emails 3/17/14	Trae 5823-25
5	Mills / Donaldson Email 3/20/14	Trae 5970-71
6	Email Exchanges 4/1/14	Trae 6288-89
7	Email Exchanges 4/14/14	Trae 6754-56
8	Email Exchanges 5/8/14	Trae 7616-17
9	Email Exchanges 5/20/14	Trae 7933-37
10	Donaldson Email 6/3/14	Trae 8275
11	LaRocco Email 6/5/14	Trae 8367-68
12	Email Exchanges and Employee Counseling Notice 6/4/14	Trae 8429-34 Trae/Enviro 000020
13	LaRocco Email 6/8/14	Trae 8411
14	Donaldson Email 6/9/14	Trae 8427
15	Email Exchanges 6/9/14	Trae 8456-61
16	Email Exchanges 6/17/14	Trae 8634-38
17	Letter Re Capital Call 6/18/14	
18	LaRocco Email 6/21/14	Trae 8816
19	Email Re Capital Call 6/23/14	
20	LaRocco Email and Performance Observations 6/26/14	Trae 8962-64
21	Email Exchanges 7/16/14	Trae 9585-86, 89-90
22	Aleman Handwritten Notes 7/17/14	Trae/Enviro 000057
23	Whyrick Email 7/17/14	Trae 9593-96
24	Email Exchanges 8/4/14	Trae 10196, 10200-01

25	Whyrick Observations RE Donaldson 7/3/14	Trae/Enviro 000028
26	Mills: Michael Donaldson Report	Trae/Enviro 000006
27	Email Exchanges 8/6-8/7/14	Trae 10270-73
28	Donaldson Email 8/17/14	Trae 10709-10711
29	Plaintiff's Complaint	
30	Plaintiffs' Supplemental Objections and Responses to Defendants' Interrogatories	
31	Defendants May Introduce Any Exhibit Attached to Plaintiff's Opposition to Summary Judgment	
32	Defendants May Introduce Any Exhibit Identified on Plaintiff's Exhibit List	
33	Unemployment Statistics from the U.S. Department of Labor, Bureau of Labor Statistics: National, State, County	

Dated: December 2, 2019.

Respectfully submitted,

/s/ Jackson S. Nichols

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--and—

/s/ Lars H. Liebeler

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CERTIFICATE OF SERVICE

This is to certify that I have on December 2, 2019 served all the parties in this case with this **Rule 26(a)(3) Pre-Trial Disclosures** in accordance with the notice of electronic filing (“ECF”), which was generated as a result of electronic filing in this court.

/s/ Lars H. Liebeler

Lars H. Liebeler, Esq.